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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

MIMOZA FERRAJ BABA, individually and  
as executrix of the estate of RESMI FERRAJ,

PLAINTIFF,

v.

REPUBLIC OF ALBANIA, a sovereign  
nation; MINISTRY OF ECONOMY, TRADE  
AND ENERGY OF ALBANIA, an Albanian  
government agency; ALBPETROL, SH.A., an  
Albanian corporate entity wholly owned by the  
Albanian government; JOHN/JANE DOES 1-  
20, fictitious names representing unknown  
individuals; ABC ENTITIES 1-20, fictitious  
names representing unknown entities.

DEFENDANTS.

**CIVIL ACTION**

DOCKET NO.: **12-4333 (ES)**

**AFFIDAVIT OF  
MATTHEW T. RINALDO  
IN OPPOSITION TO  
DISMISSAL**

I, Matthew T. Rinaldo, Esq., of full age , hereby certify as follows:

1. I am an attorney at law of the State of New Jersey with the law office of Rinaldo and,  
Rinaldo Associates.

2. I represent the Plaintiff Mimoza Ferraj Baba in the above captioned case and as such I am fully familiar with the facts and circumstances of the litigation, and whether defendants were served the Complaint.

3. Pursuant to the Court's Notice of Call For Dismissal dated August 8, 2013, made returnable on September 4, 2013, I make this Affidavit in opposition to a dismissal of the case at this time.

4. On July 12, 2012, I filed a Complaint in the within matter.

5. Since Defendants are located in a foreign jurisdiction, I followed the steps for service outlined in the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents and Fed. R. Civ. Proc. 4(f)(1).

6. On July 27, 2012, I did cause to be mailed, by certified mail, copies of a Waiver of the service of Summons, Filed Complaint, Filed Civil Cover Sheet, and Filed Exhibit to the Complaint to :

Republic of Albania, Certified Mail # 7010 1870 0002 7194 1457  
Ruga George W. Bush  
Tirana 1010. Albania

Ministry of Economy, Trade and Energy of Albania, Certified Mail # 7012 1870 0002 7194 1464  
Blvd. Deshmoret e Kombit No. 2  
Tirana, Albania

Albpetrol, Sh.A. Certified Mail # 7010 1870 0002 7194 1471  
Patos  
Fier, Albania

7. On July 28, 2012, I did cause to be mailed by express mail, copies of a Waiver of the service of Summons, Filed Complaint, Filed Civil Cover Sheet, and Filed Exhibit to the Complaint to :

Republic of Albania, Express Mail #EI 500753980US  
Ruga George W. Bush  
Tirana 1010. Albania

Ministry of Economy, Trade and Energy of Albania, Express Mail # EI 500754733US  
Blvd. Dëshmoret e Kombit No. 2  
Tirana, Albania

Albpetrol, Sh.A. Express Mail # EI 500754747US  
Patos  
Fier, Albania

8. The United States Post Office confirmed the delivery of both mailings to the  
Ministry of Economy, Trade and Energy of Albania and Albpetrol.

9. Thereafter, on or about August 14, 2012, the mailing sent to Republic of Albania was  
returned to this office..

10. Thereafter, Plaintiff supplied this office with the names and addresses of the Prime  
Minister of Albania and Advisor to Prime Minister on Economy and we thus sent via express  
mail copies of the aforementioned summons, complaint, cover sheet and exhibit to:

Prime Minister Express Mail #EM632591345US  
Prof. Dr. Sali Bersiha  
Bulevardi Dëshmoret e Kombit  
N. 1, 1000  
Tiranë, Albania

Advisor to Prime Minister on Economy, Express Mail # EM632591331US  
Petraq Milo  
Bulevard Dëshmoret e Kombit  
N. 1, 1000  
Tiranë, Albania

11. On September 5, 2012, the United States Post Office confirmed delivery to both the  
Prime Minister and Advisor to Prime Minister on Economy.

12. On January 24, 2013, a State Attorney of Albania filed a letter Answer to the

Complaint and among other issues stated that since the fall of communism and the institution of a new regime, a new legal framework has been established dealing with the restitution of immovable properties to the former owners expropriated by the communist regime.

13. The governing body of Albania's new Prime Minister is slated to be sworn in mid-September.

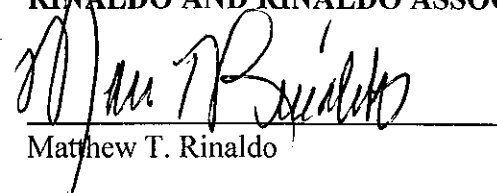
14. There is a possibility that the issues which form the subject matter of this lawsuit can be amicably worked out under the new regime.

15. I respectfully request that this Honorable Court not dismiss the lawsuit at this time and give the parties 90 days to negotiate a resolution of the matter.

16. If the matter is not resolved within said 90 day time frame, it is my intention to move for entry of a default judgment.

I hereby certify that the foregoing statements, to the best of my knowledge and belief, are true. I understand that if any of the foregoing statements made are wilfully false, I am subject to punishment.

**Respectfully submitted**  
**RINALDO AND RINALDO ASSOCIATES**

By:   
Matthew T. Rinaldo

Dated: August 28, 2013